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13 Counsel for Defendant HARTMAN

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16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19  
20 UNITED STATES OF AMERICA,  
21 Plaintiff,  
22 v.  
23 RICHARD HARTMAN,  
24 Defendant.

25 Case No.: CR 20-126 VC

26 **STIPULATION AND [PROPOSED]  
27 ORDER TO CONTINUE STATUS  
28 HEARING TO SEPTEMBER 22,  
2020, AND TO EXCLUDE TIME**

29 Hearing Date: Aug. 11, 2020

30  
31 The above-captioned matter is set on August 11, 2020, at 10:30 a.m., before this Honorable  
32 Court for a status hearing. The parties jointly request that the Court continue this matter to September  
33 22, 2020, and that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and  
34 (B)(iv), between August 11, 2020 and September 22, 2020.

35  
36 Richard Hartman is charged with the possession of child pornography. He made his initial  
37 appearance on February 28, 2020, and the magistrate court ordered him released from custody on  
38 March 5, 2020. The government prepared the discovery for production on May 15, 2020, but due to  
39 an issue with the carrier, defense counsel did not receive that discovery until June 3, 2020. Defense  
40 counsel is still reviewing the discovery with her client and will need to conduct an evidence view to

1 confirm the sentencing guidelines in the government's proposed plea offer. In addition, counsel may  
2 need to request digital forensic reports of the devices recovered to confirm the factual basis for a  
3 change of plea hearing. For these reasons, the parties respectfully request that the Court continue this  
4 case from August 11, 2020 until September 22, 2020.

5 In addition, the parties stipulate and agree that the ends of justice served by this continuance  
6 outweigh the best interest of the public and the defendant in a speedy trial. The parties further agree  
7 that the failure to grant this continuance would unreasonably deny counsel for Mr. Hartman the  
8 reasonable time necessary for effective preparation, taking into account the exercise of due diligence.  
9 Accordingly, the parties agree that the period of time between August 11, 2020 through September 22,  
10 2020, should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§  
11 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking into account the  
12 exercise of due diligence.

13  
14 IT IS SO STIPULATED.  
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16 Dated: August 7, 2020  
17  
18 STEVEN G. KALAR  
Federal Public Defender  
Northern District of California  
19  
20 /S/  
21 ANGELA M. HANSEN  
Assistant Federal Public Defender  
22 Dated: August 7, 2020  
23  
24 DAVID L. ANDERSON  
United States Attorney  
Northern District of California  
25  
26 /S/  
27 MOLLY SMOLEN  
Assistant United States Attorney  
28

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
RICHARD HARTMAN,  
Defendant

**Case No.: CR 20-126 VC**

**[PROPOSED] ORDER TO CONTINUE  
STATUS HEARING TO SEPTEMBER 22,  
2020, AND TO EXCLUDE TIME**

Based on the reasons provided in the stipulation of the parties above, and for good cause shown, the Court hereby ORDERS that the status hearing date of August 11, 2020, is vacated and reset for a status hearing on September 22, 2020, at 10:30 a.m.

It is FURTHER ORDERED that the time is excluded, pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), from August 11, 2020 through September 22, 2020.

IT IS SO ORDERED.

Dated:

THE HONORABLE VINCE CHHABRIA  
United States District Judge